

1 SAMUEL A. WONG, SBN 217104
2 swong@aegislawfirm.com
3 KASHIF HAQUE, SBN 218672
4 khaque@aegislawfirm.com
5 JESSICA L. CAMPBELL, SBN 280626
6 jcampbell@aegislawfirm.com
7 ALEX J. VALLE, SBN 334263
8 avalle@aegislawfirm.com
9 AEGIS LAW FIRM, PC
10 9811 Irvine Center Drive, Suite 100
11 Irvine, CA 92618
12 Telephone: (949) 379-6250
13 Facsimile: (949) 379-6251

14 Attorneys for Plaintiff
15 ADRIANA MAGDALENA RAMOS

16 MICHAEL J. NADER, SBN 200425
17 michael.nader@ogletree.com
18 ALEXANDRA ASTERLIN, SBN 221286
19 alexandra.asterlin@ogletree.com
20 PAUL M. SMITH, SBN 306644
21 paul.smith@ogletree.com
22 OGLETREE, DEAKINS, NASH,
23 SMOAK & STEWART, P.C.
24 500 Capitol Mall, Suite 2500
25 Sacramento, CA 95814
26 Telephone: 916-840-3150
27 Facsimile: 916-840-3159

28 Attorneys for Defendant
ROADSAFE TRAFFIC SYSTEMS, INC.

18 **UNITED STATES DISTRICT COURT**

19 **EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO**

20
21 ADRIANA MAGDALENA RAMOS,
22 individually and on behalf of all others similarly
situuated,

23 Plaintiff,

24 vs.

25 ROADSIDE TRAFFIC SYSTEMS, INC.; and
26 DOES 1 through 20, inclusive,

27 Defendant.

28 Case No. 2:23-CV-02085-KJM-CKD

**JOINT STIPULATION TO
REMAND; AND ORDER**

Action Filed: 2/8/2023
Removal Filed: 9/22/23
Trial Date: None Set

1 Plaintiff Adriana Magdalena Ramos (“Plaintiff”) and Defendant RoadSafe Traffic
2 Systems, Inc. (“Defendant”) (collectively, the “Parties”), by and through their respective counsel
3 of record, hereby stipulate, agree as follows:

4 WHEREAS, on February 8, 2023, Plaintiff filed a wage and hour putative class action
5 complaint against Defendant in the Sacramento County Superior Court.

6 WHEREAS, on September 22, 2023, Defendant removed this case to the District Court
7 for the Eastern District of California.

8 WHEREAS, on October 23, 2023, Plaintiff filed her Motion to Remand Action to State
9 Court, on the basis that the amount in controversy did not exceed \$5 million, and remand is
10 therefore required.

11 WHEREAS, on November 6, 2023, Defendant filed its Opposition to Plaintiff’s Motion
12 to Remand Action to State Court.

13 WHEREAS, on November 16, 2023, Plaintiff filed her Reply in Support of Motion to
14 Remand Action to State Court. As of the date of this Joint Stipulation, the Court has yet to rule
15 on Plaintiff’s Motion to Remand Action to State Court.

16 WHEREAS, on November 27, 2023, pursuant to the Parties’ joint stipulation, the Court
17 stayed this case and vacated all hearing dates until March 14, 2024, pending the Parties’
18 mediation.

19 WHEREAS, on January 23, 2024, the Parties attended early private mediation with the
20 Hon. Carl. J. West (Ret.), a respected mediator in wage and hour class actions. At mediation, the
21 Parties reached an agreement to settle this Class Action case for less than \$5,000,000.

22 WHEREAS, on February 13, 2024, the Parties fully executed the memorandum of
23 understanding memorializing the terms of their settlement agreement.

24 WHEREAS, a material term of the Parties’ settlement includes remanding this Class
25 Action matter to the Sacramento County Superior Court.

26 //

27 //

1 WHEREAS, the Parties have agreed and hereby stipulate that the Action be remanded to
2 the jurisdiction of the Sacramento County Superior Court for all further proceedings.
3

4 **IT IS SO STIPULATED.**

5 Dated: February 16, 2024

AEGIS LAW FIRM, PC



6
7 By: _____
8 Jessica L. Campbell
9 Alex J. Valle
10 Attorneys for Plaintiff Adriana Magdalena Ramos
11

12 Dated: February 16, 2024

**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**

13 By: /s/Paul M. Smith
14 Michael J. Nader
15 Alexandra Asterlin
16 Paul M. Smith
17

18 Attorneys for Defendant
19 ROADSAFE TRAFFIC SYSTEMS, INC.
20
21
22
23
24
25
26
27
28

ORDER

THIS COURT, having read and considered the Joint Stipulation to Remand among and between plaintiff ADRIANA MAGDALENA RAMOS and defendant ROADSAFE TRAFFIC SYSTEMS, INC., and finding good cause therefor, orders as follows:

1. This action is remanded in its entirety to the Sacramento County Superior Court.
2. All other dates currently pending and/or scheduled in this action are vacated.

IT IS SO ORDERED.

DATED: February 22, 2024.

CHIEF UNITED STATES DISTRICT JUDGE